UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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HUDSON PRIVATE LP, : Case No. 7:22-cv-05520

Plaintiff, : MOTION FOR

: <u>SUMMARY JUDGMENT</u>

v.

CREATIVE WEALTH MEDIA FINANCE CORP.,

Defendant.

:

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Declaration of Christopher Conover, and the exhibits thereto, and upon all pleadings and proceedings had herein, plaintiff Hudson Private Corp. ("Plaintiff") will move this Court, before the Honorable Paul A. Engelmayer, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, at a date and time to be set by the Court, for an Order: (1) pursuant to Federal Rule of Civil Procedure 56, granting Plaintiff summary judgment against defendant Creative Wealth Media Finance Corp. ("Defendant") based upon Defendant's default under a Promissory Note dated July 16, 2020 (the "Note"); said summary judgment to be in the principal amount of \$3,000,000.00, plus contractual interest at the rate of 10% per annum (compounded annually) from July 16, 2020 through the date of collection, plus additional interest at the rate of 1.5% per month from January 3, 2022 through the date of collection, plus Plaintiff's reasonable attorneys' fees and expenses incurred in connection with the collection and enforcement of the Note; and (2) granting Plaintiff such other and further relief as the Court deems just and proper.

Dated: New York, NY December 1, 2022 Respectfully submitted, MEISTER SEELIG & FEIN LLP

/s/ Kevin Fritz

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